

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

AMY WYNNE,
Plaintiff,

v.

AUDI OF AMERICA, et al.,
Defendants.

Case No. [21-cv-08518-DMR](#)

**ORDER ON JOINT DISCOVERY
LETTER**

Re: Dkt. No. 94

The court has reviewed the parties' October 6, 2022 joint discovery letter. [Docket No. 94.] This matter is suitable for resolution without a hearing. Civ. L.R. 7-1(b).

The Rule 30(b)(6) deposition of Defendant Sanctus LLC dba Shift Digital shall go forward on October 25, 2022. The other two depositions referenced in Defendant's portion of the joint letter shall also go forward during the week of October 24, 2022.

The parties shall immediately meet and confer on the entry of one of the court-approved model protective orders and submit a stipulated protective order in accordance with Section 16 of the court's Standing Order. Since Plaintiff "does not feel strongly about" the issue of which model order to use, Jt. Letter 2, the parties should use the model protective order for litigation involving patents, highly sensitive confidential information and/or trade secrets because Plaintiff's allegations involve the disclosure of personal identifiable information.

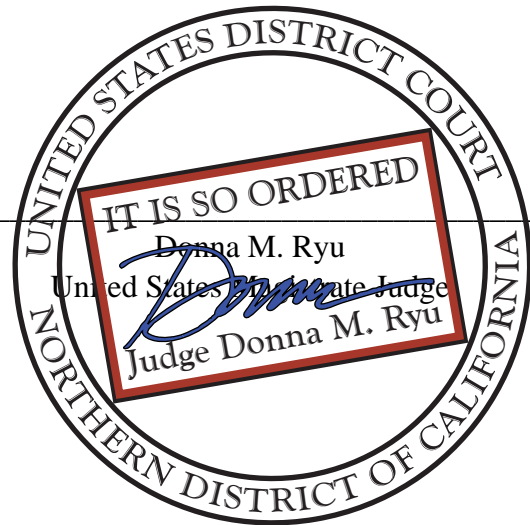
Finally, Plaintiff asks the court to set a deadline for Defendant's production of "the Topic 17 'service provider' contract information. *Id.* Defendant did not respond to this issue and it does not appear to be ripe for decision.

The court takes note of the parties' inability to resolve the foregoing disputes without court intervention. These are the type of issues that counsel should routinely be able to work out

1 themselves. The court may sanction the parties if this pattern continues.

2
3 **IT IS SO ORDERED.**

4 Dated: October 13, 2022



United States District Court
Northern District of California